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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

ERASTO MARTINEZ-SANDOVAL
Petitioner,

v.

CHARLOTTE COLLINS, Warden, et al

Respondents.

Case No. 1:26-cv-00082-DAE

**PETITIONER'S REPLY TO
RESPONDENTS'
ABBREVIATED
RESPONSE to PETITION FOR
WRIT OF HABEAS CORPUS**

The Petitioner provides this Reply to the Respondents' Abbreviated Response filed with this Court on January 22, 2026. As a preliminary matter, Respondents address concerns in their Response regarding the birth date of the Petitioner. **ECF 4, p. 1-2.** The Petitioner's year of birth is 1980 and he is 45 years old. Petitioner has attached a copy of his redacted passport to this Reply in order to verify his identity for this Court. **Exh C - Passport of Erasto Martinez-Sandoval.** At the time of the preparation of Petitioner's case, Petitioner's counsel was only in possession of limited information that has now been clarified. All other assertions in Petitioner's original petition are still believed to be true and correct.

As the Respondents have raised no new issues and have not distinguished the present case from prior similar decisions of this Court, the Petitioner submits that this case is ripe for adjudication. Nevertheless, the Petitioner remains disposed to provide additional documentation or briefing on any particular issue at the Court's request.

Respectfully submitted,

/s/ Mark Kinzler

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